

EXHIBIT A

JAE LEE LAW, P.C.
2050 Center Avenue, Suite 120
Fort Lee, New Jersey 07024
Telephone No.: (201)346-3800
Facsimile No.: (201) 346-3822
Attorneys for Plaintiff, *Pedro Taveras Jr.*

PEDRO TAVERAS, JR.

Plaintiff,

vs.

WALMART INC., "JOHN DOES 1-5", and "ABC
COMPANIES 1-5", (both being fictitious
designations),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L-2760-22

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, TO THE ABOVE NAMED DEFENDANT(S):

Walmart Inc

THE PLAINTIFF, named above has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of Service with the deputy clerk of the Superior Court in the County listed above within 35 days from the date you received this Summons, not counting the date you received it. If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee and complete case Information Statement), if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a Judgment against you for the relief of plaintiff's demands, plus interest and costs of suit. If judgment is entered against you the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling the Lawyer Referral Services. A list of these numbers is also provided.

/s/ Michelle M. Smith, Clerk
MICHELLE M. SMITH, CLERK

Dated: May 23, 2022

Name and Address of Defendant:

**Walmart Inc
1 Teterboro Landing Dr
Teterboro, NJ 07608**

JAE LEE LAW, P.C.
By: Pasha Razi, Esq.
2050 Center Avenue, Suite 120
Fort Lee, New Jersey 07024
Telephone No.: (201) 346-3800
Facsimile No.: (201) 346-3822
New Jersey Attorney ID: 205192017
Attorneys for Plaintiffs, *Pedro Taveras Jr.*

PEDRO TAVERAS, JR.

Plaintiff,

vs.

WALMART INC., "JOHN DOES 1-5", and
"ABC COMPANIES 1-5", (both being fictitious:
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L-

CIVIL ACTION

COMPLAINT and JURY DEMAND

Plaintiff, Pedro Taveras Jr., residing at 184 Glenwood Ave, in Borough of Bloomfield,
County of Bergen, State of New Jersey, by way of Complaint against the Defendants, says:

FIRST COUNT

1. On or about July 15, 2021, Plaintiff, Pedro Taveras Jr., was lawfully upon the premises located at Walmart, on 1 Teterboro Landing Dr, in the City of Teterboro, County of Bergen, and State of NJ.

2. At the aforesaid time and place, the premises was owned, operated, maintained and/or controlled, as owner, landlord, lessee and/or lessor by Defendants, Walmart Inc., "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious name for individuals whether individually, partnerships or corporations who may be responsible).

3. At the aforesaid time and place, Defendants, Walmart Inc., "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), through its agents, servants, and/or employees had a duty to Plaintiff and persons such as Plaintiff, to keep and maintain the premises in a safe and proper condition and free and clear of any and all hazardous and dangerous conditions and disrepairs which would endanger the safety of Plaintiff and person such as Plaintiff.

4. At the aforesaid time and place, Defendants so negligently and carelessly owned, operated, maintained and/or controlled the subject premises in such a way so as to cause Plaintiff, Pedro Taveras Jr., to become injured due to the presence of a hazardous and dangerous condition on such premises.

5. Defendants above disregarded its duty aforesaid and negligently and carelessly allowed its premises to be improperly, dangerously and palpably unreasonably maintained and to remain in an unsafe and dangerous condition in allowing said hazardous and dangerous condition to exist on its premises, all of which Defendants had due notice or by reasonable inspection thereof, would have had due notice.

6. That at all times hereinafter mentioned, the said Defendants had actual notice and/or constructive notice of said hazardous and dangerous condition and/or by reasonable inspection thereof, would have had due notice of the hazardous and dangerous condition existing.

7. As a result of the aforesaid carelessness and negligence of Defendant, Plaintiff suffered severe and permanent injuries; was disabled and disfigured; has suffered and will continue to suffer great pain and torment, both mental and physical.

8. As a further result of Defendants' aforesaid negligence and the injuries thereby caused to Plaintiff, Plaintiff has been and will be in the future compelled to spend great and diverse sums of

money for medical aid and treatment, and has been and will be prevented from attending to the usual occupation, duties, activities and business.

WHEREFORE, Plaintiff, Pedro Taveras Jr., demands judgment against Defendants, Walmart Inc., "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), for damages, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats and allegations of the First Count of the Complaint as if set forth at length herein.

2. Plaintiff reserves the right to amend the Complaint to substitute the names of the actual business entity or individual for the fictitious name "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), should it be determined that other persons or entities are responsible for the condition which caused the incident complained of.

WHEREFORE, Plaintiff, Pedro Taveras Jr., demands judgment against Defendants, Walmart Inc., "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), for damages, together with interest and costs of suit.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.


DESIGNATION of TRIAL COUNSEL

Pursuant of Rule 4:5-1(c), Martin S. Cedzidlo, Esq., is hereby designated as Trial Counsel.

CERTIFICATION

I hereby certify that this matter is not the subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this Plaintiff, and that there are no other parties, whom, to the knowledge of Plaintiff(s)' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Pasha Razi

Date: May 10, 2022

Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-002760-22

Case Caption: TAVERAS, JR. PEDRO VS WALMART INC.

Case Initiation Date: 05/20/2022

Attorney Name: PASHA RAZI

Firm Name: JAE LEE LAW PC

Address: 2050 CENTER AVE STE 120

FORT LEE NJ 07024

Phone: 2013463800

Name of Party: PLAINTIFF : Taveras, Jr., Pedro

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Pedro Taveras, Jr.? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

05/20/2022
Dated

/s/ PASHA RAZI
Signed

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 221-0700
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 20, 2022
RE: TAVERAS, JR. PEDRO VS WALMART INC.
DOCKET: BER L -002760 22

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON PETER G. GEIGER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: PASHA RAZI
JAE LEE LAW PC
2050 CENTER AVE STE 120
FORT LEE NJ 07024

ECOURTS